# THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT

POL	POLICE NO. :   KC		C25000238	
PROSECUT	OR NO.:	095484	1728	
	OCN:			
STATE OF MISSOURI,			)	
,	PLAIN	TIFF,	, )	
vs.			)	
			)	
DANTE KIREE DRAPER	R		)	
2238 E 69TH TER			) CASE NO. 2516-CR	
Kansas City, MO 64132			) DIVISION	
DOB:			)	
Race/Sex: B/M			)	
S.S.N.:			)	
	DEFEND	OANT.	, )	
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# COMPLAINT WARRANT REQUESTED

# Count I. Burglary 1st Degree (569.160-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the class B felony of burglary in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about January 2, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at City, and possessed by , for the purpose of committing stealing therein, and while in such a building another participant in the deadly crime was armed with weapon. The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

# Count II. Armed Criminal Action (571.015-001Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon

conviction under Section 571.015.1, RSMo, in that on or about January 2, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of Burglary in the First Degree as charged in Count 1, all allegations of which are incorporated here by reference, and the defendant, either acting alone or purposefully in concert with another, committed the foregoing felony of Burglary in the First Degree by, with, and through, the knowing use, assistance, and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

# Count III. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about January 2, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at Kansas City, and possessed by Frutopia, for the purpose of committing stealing therein.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

#### Count IV. Burglary 1st Degree (569.160-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the class B felony of burglary in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about January 2, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at City, and possessed by , for the purpose of committing stealing therein, and while in such a building another participant in the crime with deadly was armed weapon. The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

# Count V. Armed Criminal Action (571.015-001Y20205203.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about January 2, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of Burglary in the First Degree as charged in Count 4, all allegations of which are incorporated here by reference, and the defendant, either acting alone or purposefully in concert with another, committed the foregoing felony of Burglary in the First Degree, by, with, and through, the knowing use, assistance, and aid of deadly weapon. The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal

Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

#### Count VI. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about January 2, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at and posfor the purpose of committing stealing therein. sessed by The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

#### Count VII. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section

569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about January 2, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at the committee of committing stealing therein.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

# Count VIII. Stealing - Motor Vehicle/Watercraft/Aircraft (570.030-038Y20202499.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the class D felony of stealing, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 9, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, appropriated a black Jeep Grand Cherokee, a motor vehicle, which property was owned by , and the defendant appropriated such property without the consent of and with the purpose deprive her to of it. The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

# Count IX. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that

on or about February 9, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at Kansas City, and owned by therein.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

# Count X. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 9, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at City, and owned by stealing therein.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

### Count XI. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 11, 2025, in the County of Jackson, State of Missouri, the

defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at City, and possessed by for the purpose of committing stealing therein.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

### Count XII. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 11, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at City, and possessed by the formula of the county of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at the county of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at the county of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at the county of Jackson and the county of Jackson and Jackson and Jackson and Jackson are concert with another acting the county of Jackson and Jackson are concert with another acting the county of Jackson and Jackson are concert with another acting the county of Jackson and Jackson are concert with another acting the concert with another acting the county of Jackson and Jackson are concert with another acting the concert with another acting the concert with a con

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# Count XIII. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 11, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at City, and possessed by , for the purpose of committingstealing

therein.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

#### Count XIV. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 11, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully inc oncert with another, knowingly entered unlawfully in a building, located at City, and possessed by for the purpose of committing stealing therein.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

# Count XV. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 11, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at and possessed by for the purpose of committing stealing therein. The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to

exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

#### Count XVI. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 15, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at , for the purpose of Kansas City, and possessed by committing stealing therein. The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

# Count XVII. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree. punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 15, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at , for the purpose of committing City, and possessed by stealing therein. The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the

crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

# Count XVIII. Stealing - Motor Vehicle/Watercraft/Aircraft & Prior Stealing Offender (570.030-031Y20202402.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of 24.02.1 STEALING: WITHOUT CONSENT

Section 570.030, RSMo, committed the class B felony of stealing, punishable upon conviction under Section(s) (558.011) (558.002 and 558.011), RSMo, in that on or about February 15, 2025, in the County of Jackson, State of Missouri, the defendant appropriated [Insert one of the following. Omit brackets and number. See Notes on Use 2.]

- [1] [Describe property or services.] of a value of at least one hundred fifty dollars,
  - [2] [Describe property.] by physically taking it from the person of
- [3] [Describe property without regard to value, of a specific type listed in Sections 570.030.3(3) or 570.030.5(3), (for example "marijuana, a controlled substance." or "poison gas bomb, an explosive weapon.")],
- [4] [Describe property of a specific type listed in Section 570.030.5(3)(j) or (l) RSMo] of a value of more than three thousand dollars,
  - [5] (anhydrous ammonia) (liquid nitrogen),
- [6] [Describe property of a specific type listed in Section 570.030.5(3)(j) RSMo] of a value of more than ten thousand dollars,
  - [7] [Describe property of a specific type listed in Section 570.030.6(1)],
- [8] [Describe the property or services, without alleging the value thereof, of a type other than any of the specific types listed in Sections 570.030.2, 570.030.3, 570.030.5(3), 570.030.6(1).],

which [(property was) (services were)] in the possession of
and defendant appropriated such (property) (services)
without the consent of
purpose to deprive
and with the
thereof (.) (, and)

(The defendant previously has pleaded guilty to or been found guilty of (two) (three) stealing-related offenses committed on (two) (three) separate occasions where such offenses occurred within ten years of the date of occurrence of the present offense. The offenses are as follows:

[1] On or about (date), in [Identify the particular court and jurisdiction; and if a municipal division, state that the defendant was represented by an attorney or waived counsel in writing and that the judge accepting the plea or making the findings was a licensed attorney at the time of the court proceedings.], the defendant (pleaded guilty to) (was found guilty of) (was convicted of)

the offense of [Name the stealing-related offense.] for events that occurred on [date].

[2] [Repeat for other offenses.])

(The defendant previously has been convicted of stealing under Section (570.030.5(3)(j)) (570.030.5(3)(l)) as follows:

On or about (date), in [Identify the particular court and jurisdiction.], the defendant was convicted of the offense of stealing (livestock) (wildlife)).

#### 24.02.2 STEALING: BY DECEIT

Section 570.030, RSMo, committed the class B felony of stealing by deceit, punishable upon conviction under Section(s) (558.011) (558.002 and 558.011), RSMo, in that on or about February 15, 2025, in the County of Jackson, State of Missouri, the defendant appropriated [Insert one of the following. Omit brackets and number. See Notes on Use 2.]

- [1] [Describe property or services.] of a value of at least one hundred fifty dollars,
- [2] [Describe property, without regard to value, of a specific type listed in Sections 570.030.3(3) or 570.030.5(3) for example: "a Ford Mustang, a motor vehicle," "marijuana, a controlled substance," or "poison gas bomb, an explosive weapon.")],
- [3] [Describe property of a specific type listed in Section 570.030.5(3)(j) or (l) RSMo] of a value of more than three thousand dollars,
  - [4] (anhydrous ammonia) (liquid nitrogen),
- [5] [Describe property of a specific type listed in Section 570.030.5(3)(j) RSMo] of a value of more than ten thousand dollars,
  - [6] [Describe property of a specific type listed in Section 570.030.6(1)]
- [7] [Describe property or services, without alleging the value thereof, of a type other than any of the specific types listed in Sections 570.030.2, 570.030.3, 570.030.5(3) or 570.030.6(1).],

which (property was) (services were) in the possession of
and defendant appropriated such (property) (services)
and with the purpose to deprive
thereof by deceit in that the defendant
represented to
made by defendant.], which representation(s) (was) (were) false and (known by
defendant to be false) (not believed to be true by the defendant) and
relied on the representation(s) and was
thereby induced to part with such (property) (services) (.) (, and)

(The defendant previously has pleaded guilty to or been found guilty of (two) (three) stealing-related offenses committed on (two) (three) separate occasions where such offenses occurred within ten years of the date of occurrence of the present offense. The offenses are as follows:

- [1] On or about (date), in [Identify the particular court and jurisdiction; and if a municipal division, state that the defendant was represented by an attorney or waived counsel in writing and that the judge accepting the plea or making the findings was a licensed attorney at the time of the court proceedings.], the defendant (pleaded guilty to) (was found guilty of) (was convicted of) the offense of [name the stealing-related offense] for events that occurred on [date].
  - [2] [Repeat for other offenses.])

(The defendant previously has been convicted of stealing under Section (570.030.5(3)(j)) (570.030.5(3)(l)) as follows:

On or about (date), in [Identify the particular court and jurisdiction.], the defendant was convicted of the offense of stealing (livestock) (wildlife)).

#### 24.02.3 STEALING: BY COERCION

Section 570.030, RSMo, committed the class B felony of stealing by coercion, punishable upon conviction under Section(s) (558.011) (558.002 and 558.011), RSMo, in that on or about February 15, 2025, in the County of Jackson, State of Missouri, the defendant appropriated [Insert one of the following. Omit brackets and number. See Notes on Use 2.]

- [1] [Describe property or services.] of a value of at least one hundred fifty dollars,
- [2] [Describe property, without regard to value, of a specific type listed in Sections 570.030.3(3) or 570.030.5(3) (for example, "marijuana, a controlled substance," or "poison gas bomb, an explosive weapon.")],
- [3] [Describe property of a specific type listed in Section 570.030.5(3)(j) or (l), RSMo] of a value of more than three thousand dollars,
  - [4] (anhydrous ammonia) (liquid nitrogen),
- [5] [Describe property of a specific type listed in Section 570.030.5(3)(j) RSMo] of a value of more than ten thousand dollars,
  - [6] [Describe property of a specific type listed in Section 570.030.6(1)]
- [7] [Describe property or services, without alleging the value thereof, of a type other than any of the specific types listed in Sections 570.030.2, 570.030.3, 570.030.5(3) or 570.030.6(1).],

which (property was) (services were) in the possession of and defendant appropriated such (property) (services) from [name of victim] and with the purpose to deprive [name of victim] thereof by coercion by threatening [Insert one of the following. Omit brackets and number.]

- [1] to commit the offense of [name of offense] by [Describe conduct threatened.]
- [2] to inflict physical injury in the future on [name of person] by [Describe conduct threatened.]

- [3] to accuse [name of person] of having committed the offense of [name of offense]
- [4] to expose [name of person] to hatred, contempt or ridicule by [Describe matter threatened to be exposed and the threatened manner of disclosure.]
- [5] to harm the (credit) (or) (business) reputation of [name of person] by [Describe conduct threatened.]
- [6] to [Describe threat that will satisfy types of threats in Section 570.010(4)(f) or (g).]
  - (.) (, and)

(The defendant has previously pleaded guilty to or been found guilty of (two) (three) stealing-related offenses committed on (two) (three) separate occasions where such offenses occurred within ten years of the date of occurrence of the present offense. The offenses are as follows:

- [1] On or about (date), in [Identify the particular court and jurisdiction; and if a municipal division, state that the defendant was represented by an attorney or waived counsel in writing and that the judge accepting the plea or making the findings was a licensed attorney at the time of the court proceedings.], the defendant (pleaded guilty to) (was found guilty of) the offense of [name the stealing-related offense] for events that occurred on [date].
  - [2] [Repeat for other offenses.])

(The defendant has previously been convicted of stealing under Section (570.030.5(3)(j)) (570.030.5(3)(l)) as follows:

On or about (date), in [identify the particular court and jurisdiction], the defendant was convicted of the offense of stealing (livestock) (wildlife)).

#### 24.10 RECEIVING STOLEN PROPERTY

Section 570.030.1(3), RSMo, committed the class B felony of receiving stolen property, punishable upon conviction under Section(s) (558.011) (558.002 and 558.011), RSMo, in that on or about February 15, 2025, in the County of Jackson, State of Missouri, the defendant, with the purpose to deprive the owner of [Describe property.] (received) (retained) (disposed of) such property, (knowing) (believing) (knowing or believing) that it had been stolen(.) (, and) the property appropriated was [Insert one of the following. Omit bracket and number.]

- [1] [Describe property] of the value of at least one hundred fifty dollars,
- [2] [Describe property without regard to value, of a specific type listed in Sections 570.030.3(3) or 570.030.5(3), RSMo., for example: "a Ford Mustang, a motor vehicle," "marijuana, a controlled substance" or "poison gas bomb, an explosive weapon],
- [3] [Describe property of a specific type listed in Section 570.030.5(3)(j) or (l) RSMo] of a value of more than three thousand dollars,
  - [4] (anhydrous ammonia) (liquid nitrogen),

- [5] [Describe property of a specific type listed in Section 570.030.5(3)(j) RSMo] of a value of more than ten thousand dollars,
  - [6] [Describe property of a specific type listed in Section 570.030.6(1)],
- [7] [Describe the property, without alleging the value thereof, of a type other than any of the specific types listed in Sections 570.030.2, 570.030.3, 570.030.5(3) or 570.030.6(1)].

(The defendant has previously pleaded guilty to or been found guilty of (three) stealing-related offenses committed on (three) separate occasions where such offenses occurred within ten years of the date of occurrence of the present offense. The offenses are as follows:

- 1. On or about) (date), in [Identify the particular court and jurisdiction; and if a municipal division, state that the defendant was represented by an attorney or waived counsel in writing and that the judge accepting the plea or making the findings was a licensed attorney at the time of the court proceedings.], the defendant (pleaded guilty to) (was found guilty of) the offense of [name the stealing-related offense] for events that occurred on [date].
  - 2. [Repeat for other offenses.])

(The defendant has previously been convicted of receiving stolen property under Section (570.030.5(3)(j)), (570.030.5(3)(l)) as follows: On or about (date), in [identify the particular court and jurisdiction], the defendant was convicted of the offense of receiving stolen (livestock) (wildlife)).

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

# Count XIX. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 26, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at City, and possessed by the purpose of committing stealing.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) years.

Missouri Department for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and

a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

# Count XX. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about May 25, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at and possessed by

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

# Count XXI. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about May 25, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at and pos-, for the purpose of committing stealing therein. sessed by The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about May 25, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at Kansas City, and possessed by stealing therein.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

#### Count XXIII. Burglary - 2nd Degree (569.170-001Y20202202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about May 25, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at City, and possessed by the formula of the purpose of committing stealing therein.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, made a part hereof, and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

# MELESA N. JOHNSON

Prosecuting Attorney Jackson County, Missouri by,

<u>/s/</u> (#)

Assistant Prosecuting Attorney , MO

# **WITNESSES:**

The State's witnesses as of 6/6/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.

State vs. Dante Kiree Draper, Case No.